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Attorneys for Defendant
CHEVRON STATIONS INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Catherine Tremblay, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

Chevron Stations, Inc., a Delaware
Corporation,

Defendant.

CASE NO. CV 07-6009 EDL

**STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE**

Date: July 1, 2008
Time: 10:00 a.m.
Courtroom: E, 15th Floor

Complaint Filed: November 28, 2007

Hon. Elizabeth D. LaPorte

Pursuant to Rules 6-2 and 7-11 of the Civil Local Rules of the Northern District of
California, all parties to this action, through their duly authorized undersigned counsel, stipulate
and request as follows:

WHEREAS, the complaint in this action was filed on November 28, 2007;

1 WHEREAS, the Court has scheduled a Case Management Conference for July 1, 2008,
2 and ordered the parties to submit a Joint Case Management Statement by June 24, 2008;

3 WHEREAS, the parties participated in a settlement conference before Magistrate Judge
4 Wayne D. Brazil on June 17, 2008, and, subsequent to that settlement conference, the parties have
5 reached a tentative agreement to settle the instant action;

6 WHEREAS, as part of that tentative agreement, the claims and settlement in the instant
7 action will be incorporated into the class settlement in *Sandoval v. Chevron Stations, Inc.*, Case
8 No. CV 061690 ("*Sandoval*"), and the related case *Morris v. Chevron Stations, Inc.*, Case No.
9 BC361380 ("*Morris*"), pending before the Honorable Judge Victoria Chaney in the Superior
10 Court, Los Angeles County;

11 WHEREAS, in light of the tentative agreement in the instant action, the parties in
12 *Sandoval/Morris* will seek to continue the Preliminary Approval Hearing in that matter, which is
13 currently set for June 27, 2008, for fourteen to twenty-one days, in order to formally incorporate
14 the *Tremblay* claims and settlement into the *Sandoval/Morris* proceedings and settlement;

15 WHEREAS, the parties believe that, in the interests of efficiency and of avoiding
16 potentially unnecessary expenses, the Case Management Conference should be continued for
17 sixty (60) days to allow the parties to amend any pleadings or other filings in the *Sandoval/Morris*
18 matters, finalize their settlement documents, allow for Judge Chaney to grant Preliminary
19 Approval of the settlement in *Sandoval/Morris* and to thereafter seek the dismissal of the instant
20 action;

21 IT IS HEREBY STIPULATED by and between the parties, through their respective
22 counsel:

23 1. The Case Management Conference and the deadline for filing a Case Management
24 Statement are hereby continued for sixty (60) days.

25 2. The parties must file a Joint Case Management Statement at least seven (7) days before
26 the Case Management Conference.

Exhibit A

1 Dated: June 24, 2008

JONES DAY

2
3 By: _____

Aaron L. Agenbroad

4
5 Attorneys for Defendant
CHEVRON STATIONS INC.
6 HARRIS & RUBLE
NORTH BAY LAW GROUP

7 Dated: June 24, 2008

8 By: _____

David Harris

9
10 Attorneys for Plaintiff
CATHERINE TREMBLAY.

11
12 **PURSUANT TO STIPULATION, the Case Management Conference is continued to**

13 _____, 2008.

14 **IT IS SO ORDERED.**

15
16 Dated: June ___, 2008

17
18
19 _____
Magistrate Judge Elizabeth D. LaPorte
20 United States District Court Judge

21
22 SFI-586458v2